

**Louisiana Department of Environmental Quality  
Office of Environmental Services**

**STATEMENT OF BASIS  
For  
Activity Number: PER20070001  
Permit No. 3033-V1**

**Baton Rouge Junction Facility  
Agency Interest No. 27646  
Colonial Pipeline Company  
Jackson, East Feliciana Parish, Louisiana**

**I. APPLICANT**

**Company**

Colonial Pipeline Company  
1476 Highway 61  
Jackson, Louisiana 70748

**Facility**

Baton Rouge Junction Facility  
1476 Highway 61, Jackson, East Feliciana Parish, Louisiana  
UTM Coordinates: 665.31 kilometers East and 3399.57 kilometers North, Zone 15

**II. FACILITY AND CURRENT PERMIT STATUS**

The Baton Rouge Junction Facility consists of Tank 132 for gasoline storage and its associated fugitive emissions. The facility currently operates under Permit 3033-V0, dated May 12, 2006.

**III. PROPOSED PERMIT / PROJECT INFORMATION**

**Proposed Permit**

A permit application and Emission Inventory Questionnaire (EIQ) dated September 13, 2007 were submitted requesting a Part 70 operating permit modification.

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, and in the local newspaper. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List. The application and proposed permit were submitted to the East Feliciana Parish Library. The proposed permit was submitted to US EPA Region 6. All comments will be considered prior to the final permit decision.

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**Project description**

Colonial Pipeline company requests a Part 70 operating permit modification to 1) reconcile emissions due to an update clingage factor, corrected leg height, and new tank fitting information; 2) revise the number of tank landing; and 3) include requirements for the new major source of toxic status.

**Permitted Air Emissions**

Permitted emissions in tons per year are as follows:

Pollutant	Before	After	Change
VOC	3.06	3.94	+ 0.88

**Prevention of Significant Deterioration (PSD) Applicability**

Emissions of the criteria pollutants from the facility will not increase more than their PSD significance levels. Therefore, PSD analysis was not required.

**Maximum Achievable Control Technology (MACT) requirements**

Toxic air pollutant (TAP) emissions from Tank 132 and associated fugitive components are controlled as required by 40 CFR 63 Subpart R. These are determined as MACT.

**Air Modeling Analysis**

Emissions from the facility are not expected to cause or to contribute to any National Ambient Air Quality Standards (NAAQS) or Ambient Air Standards (AAS) exceedances.

Dispersion Model Used: None

**General Condition XVII Activities**

The permit does not include any General Condition XVII Activities

**Insignificant Activities**

This permit does not include any Insignificant Activities.

**Applicable Requirements**

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the proposed permit.

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**IV. PERMIT SHIELDS**

The Permit does not include any Permit Shields

**V. PERIODIC MONITORING**

The Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the proposed permit.

**VI. APPLICABILITY AND EXEMPTIONS OF SELECTED SUBJECT ITEMS**

The explanations for the non-applicability and exemptions of selected subject items are listed in Table XI of the proposed permit.

**VII. STREAMLINED REQUIREMENTS**

The Permit does not include any streamlined requirements.

**VIII. GLOSSARY**

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring rule -- A federal air regulation under 40 CFR Part 64

Carbon Black - A black colloidal substance consisting wholly or principally of amorphous carbon and used to make pigments and ink.

Carbon Monoxide (CO) -- (Carbon monoxide) a colorless, odorless gas produced by incomplete combustion of any carbonaceous (gasoline, natural gas, coal, oil, etc.) material.

Cooling Tower -- A cooling system used in industry to cool hot water (by partial evaporation) before reusing it as a coolant.

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Continuous Emission Monitoring System (CEMS) – The total combined equipment and systems required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate of a source effluent.

Cyclone – A control device that uses centrifugal force to separate particulate matter from the carrier gas stream.

Duct Burner – A device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Federally Enforceable Specific Condition - A federally enforceable specific condition written to limit the potential to Emit (PTE) of a source that is permanent, quantifiable, and practically enforceable. In order to meet these requirements, the draft permit containing the federally enforceable specific condition must be placed on public notice and include the following conditions:

- A clear statement of the operational limitation or condition which limits the source's potential to emit;
- Recordkeeping requirements related to the operational limitation or condition;
- A requirement that these records be made available for inspection by LDEQ personnel;
- A requirement to report for the previous calendar year.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Heat Recovery Steam Generator (HRSG) – A steam generator that recovers exhaust heat from a gas turbine, and provides economizing and steam generation surfaces.

Hydrogen Sulfide (H<sub>2</sub>S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking

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into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

NESHAP - National Emission Standards for Hazardous Air Pollutants –Air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

Nitrogen Oxides (NO<sub>x</sub>) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

NSPS - New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub>- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.